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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

VENTURES TRUST 2013-I-H-R BY MCM  
CAPITAL PARTNERS LLC,

Plaintiff,

v.

SATICOY BAY LLC SERIES 4683  
AMERTRINE, a Nevada Corporation, VILLAS  
AT BLUE DIAMOND SPRINGS  
ASSOCIATION, a Nevada Non-profit  
Corporation, LEVY MILAGROS, an individual,  
DOES INDIVIDUAL I through X; and ROE  
CORPORATIONS XI-XX

Defendants.

Case No. 2:15-cv-01773-JAD-CWH

**STIPULATION FOR EXTENSION OF  
TIME TO OPPOSE VILLA AT BLUE  
DIAMOND'S MOTION TO DISMISS  
(First Request)**

**ORDER**

COMES NOW VENTURES TRUST 2013-I-H-R BY MCM CAPITAL PARTNERS  
LLC, (hereinafter "Ventures") by and through their counsel of record Thomas N. Beckom, Esq of  
the law firm of McCarthy & Holthus LLP; and VILLAS AT BLUE DIAMOND SPRINGS  
ASSOCIATION ("HOA") by and through their counsel of record David T. Gluth, Esq. of the law  
firm of Gordon & Rees LLP and hereby file this Stipulation and Order Extending the Deadlines  
for Ventures to respond to Saticoy's Motion to Dismiss filed on January 28, 2016 (Dkt.# 35)  
pursuant to LR 6-1.

**RECITALS**

1. On January 28, 2016 the HOA filed a Motion to Dismiss the Quiet Title Complaint filed by Ventures. (Dkt.# 35). Currently responses are due by February 28, 2016 and as such this stipulation has been filed timely pursuant to LR 6-1<sup>1</sup>.
2. Ventures has not previously asked for extension to respond to this motion.
3. Ventures respectfully request additional time to respond to the HOA's Motion in light of the recent Nevada Supreme Court opinion in *Shadow Wood Homeowners Association v. N.Y Comm Bank*, a recently announced opinion from the Nevada Supreme Court.

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<sup>1</sup> The Docket reflects the response date as Sunday February 14, 2016; but the stipulation is timely pursuant to Fed. R. Civ. Pro 6(a)(1)(C) as the 14<sup>th</sup> was a Sunday and the 15<sup>th</sup> was a Federal Holiday. Available at <https://www.opm.gov/policy-data-oversight/snow-dismissal-procedures/federal-holidays/#url=2016> (Last visited February 16, 2016)

**STIPULATION**

It is hereby **STIPULATED** that Ventures shall have until March 1, 2016 to respond to Saticoy's Motion to Dismiss filed January 28, 2016.

DATED this 16<sup>th</sup> day of February, 2015

DATED this 16<sup>th</sup> day of February, 2016

**GORDON & REES, LLP**

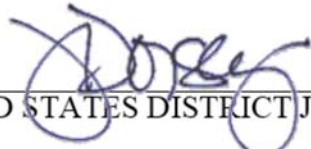
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*Attorney for the Venture Trust*

**IT IS SO ORDERED**

DATED this 16<sup>th</sup> day of February, 2016

  
UNITED STATES DISTRICT JUDGE

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